

Brian A. Bender, Esq. (BAB-0218)
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Attorneys for Defendant
LEFRAK ORGANIZATION, INC.

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GABRIEL SANDOVAL (AND WIFE, SHAYLA
RIVERA),

Case No.:
08-CV-2711

Plaintiff,

-against-

BFP ONE LIBERTY PLAZA CO., LLC, BLACKMON-
MOORING-STEAMATIC CATASTROPHE, INC.
D/B/A BMS CAT, BROOKFIELD FINANCIAL
PROPERTIES, INC., EMPIRE STATE PROPERTIES,
INC., GENERAL RE SERVICES CORP., HILLMAN
ENVIRONMENTAL GROUP, LLC., LEFRAK
ORGANIZATION, INC., NATIONAL
ASSOCIATION OF SECURITIES DEALERS, INC.,
NEW LIBERTY PLAZA LP, NEW YORK CITY
INDUSTRIAL DEVELOPMENT AGENCY, NEW
YORK CITY INDUSTRIAL DEVELOPMENT
CORPORATION, ONE LIBERTY PLAZA, THE
BOARD OF MANAGERS OF THE ONE LIBERTY
PLAZA CONDOMINIUM (CONDO #1178), WFP ONE
LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY
PLAZA, CO. GP, CORP., AND WORLD FINANCIAL
PROPERTIES, L.P.,

Defendants.

**NOTICE OF ADOPTION
OF ANSWER TO MASTER
COMPLAINT OF LEFRAK
ORGANIZATION, INC.**

PLEASE TAKE NOTICE THAT defendant, LEFRAK ORGANIZATION, INC., as
and for its response to the allegations set forth in the Complaint by Adoption (Check-Off
Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts

its Verified Master Answer dated July 30, 2007, which was filed in the matter of In Re: World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

WHEREFORE, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
May 3, 2008

Yours, etc.,

HARRIS BEACH PLLC

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**CERTIFICATE OF
SERVICE**

BFP ONE LIBERTY PLAZA CO., et al.,

Defendants.

The undersigned certifies that on May 3, 2008, I caused to be filed and served the following documents electronically via the Court's ECF system upon the parties:

1. Notice of Adoption of Answer to Master Complaint of Lefrak Organization, Inc.

Dated: New York, New York
May 3, 2008

Brian A. Bender

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